O4-05-226828
State of Wisconsin Substance Release Notification Form

PLEASE PRINT

Additional Comments on Reverse

your Emergency Hotline Nur	nber: 1-800-943-0003		Form 4400-91 Rev. 11-95			
Date and Mil. Time of Incident 5	00 9/3/88	Date and Mil. Time Reported	58:20 9/3/88			
9.3.98	777		· (· · / · ·)			
Person Reporting Cotton	Jo (son		720) 433-5011			
Representing Agency, Firm, or Citize	1 Green Ben	Packaging In	e (GBPI)			
Responsible Party GBT)I	٥ ر				
	Jelson	Telephone # (720 433 -5011			
<u> </u>	her Street	City, State, Zi	p Code Sey, WI 34307			
Substance Involved Process Water	Amount & Units Relea		is a 304 (11004 42 USC) spill?			
□ Solid □ Semisolid ➤ Liquid	□ Gas Color 🗓	Sown Odor	· · · · · · · · · · · · · · · · · · ·			
Exact Location (inc. address, facility name, r	mileage, bldg. #, etc.)	6 1601 N. Quarie	7, on the SE			
City Green Ban	County Brown	Lat/long				
DNR Region NE	1/41/4secTNI	R_(E/W) Weather Cond.				
Cause of Incident Drain value being transferred the the 2 tanks and	This wefer the	t open when overflowed the po the ground sur!	ump room between			
Spilled Substance Impact To: Check () all that apply Air Potential Soil Potential Groundwater Potential Surface Water Potential Name: Storm Sewer Potential Sanitary Sewer Potential Concrete/Asphalt Potential Private Well Potential Contained/Recovered Other:	☐ Transportation Accided Industrial Facility ☐ ☐ Ag Coop/Facility/Food ☐ Gas/Service Station/G ☐ Pipeline, Terminal, Ta ☐ Public Property (city, ☐ Utility Co., Power Ge ☐ Private Property (hom	Paper Mill	Action Taken By Spiller No Action Taken No Action Needed Monitor Cleanup Method: Waste Destination: Containment Contractor Hired Name: Other:			
Injuries? Yes No If yes, how n	•	evacuation occurred? Yes				
Are there any resource damages?	Yes □ No Potential W	What kinds? Grow Duster	contamination			
Other Agencies Notified (✓ first colum ☐ Fire Department/Hazmat ☐ Local Law Enforcement ☐ LEPC or Local Emer. Gov.	nn if notified); Check (✔) h Local DNR Div. Emer. Gov. DATCP 608-224-4500		Incident Commander, if known:			
Prepared By:(Print)	face((Sign))	Date: 9/3/98	Rpt'd to DATCP? □Yes □No			
Person Notified:	Regio	on Notified: Time:	Date:			
Invstgtd By:(Print)	(Sign)	Date 7/2/98	Site Closed? □Yes □No			
Spill Coordinator Signoff:	Date:	Transferred to ERP? ANO	NFA Letter Sent? □Yes □No			
my of CLF	9-30-98	□Yes; Case #	Spill Packet Sent? □Yes □No			

Date and Military Time of Incident 9/2/88 06:00 Responsible Party Green By Packaging Inc Additional Comments: This is the 2nd significant spill of process water at this mil (within 2 months. The volume is only a very rough estimate. I was on-site at ~10:00. Some weter was still in a small pool (pudolle). I advised constructing a small sump at the lowest corner, and getting a vacuum Arnek to allect any meter possible. I instructed Mr Nelson to send me a letter detailing: 1) the cause of this spill; 2) clean-up effected; I 3) steps which GBPI will take to prevent fature spills. This must be sent by the end of next week. I advised flat enforcent staff will be consulted to ascertain whether any enforcement active de appropriéte. Grethet Juff Hack Meeting GRPI tomorrow discuss what to do not

04:02-2502X

Green Bay Packaging



MILL DIVISION

November 17, 1998

Mr. Jeffrey J. Haack, Wastewater Engineer Wisconsin Department of Natural Resources P. O. Box 10448 Green Bay, Wisconsin 54307-0448

Dear Jeff:

Re: WPDES Permit No. WI-0000973-6, FID No. 405032100

Enclosed is a copy of the testing we had performed on our process water per your request. The test for formaldehyde was re-sampled because the laboratory exceeded the holding time. Please note that the test results are from process water and not the ground water.

The Yard Process Water Collection System is progressing. The pipe has been laid with the correct pitch. The drains and overflows are being connected as time allows since some of the tanks must be empty before they can be worked on.

Sincerely,

GREEN BAY PACKAGING INC. Mill Division

Allen a Malaon

Kathleen A. Nelson Environmental Manager

KAN:kn

Enclosures

cc: Brian Duffy
Orv Rautmann
Jeffrey Walch
File



1795 Industrial Drive Green Bay, WI 54302 920-469-2436 800-7-ENCHEM Fax: 920-469-8827

- Analytical Report -

Project Name: PROCESS WATER ANALYSIS

Project Number:

Client: GREEN BAY PACKAGING INC

WI DNR LAB ID: 405132750

Report Date: 11/6/98

Sample No.

Field ID

Collection Date

Sample No.

Field ID

Collection

Date

886051-001

PROCESS WATER

10/12/98

The "Q" flag is present when a parameter has been detected below the LOQ. This indicates the results are qualified due to the uncertainty of the parameter concentration between the LOQ and the LOQ.

Soil VOC detects are corrected for the total solids, unless otherwise noted.

I certify that the data contained in this Final Report has been generated and reviewed in accordance with approved methods and Laboratory Standard Operating Procedure. Exceptions, if any, are discussed in the accompanying sample narrative. Release of this final report is authorized by Laboratory management, as is verified by the following signature.

Approva Signature

Date

11/6/92



1795 Industrial Drive Green Bay, WI 54302 920-469-2436 800-7-ENCHEM Fax: 920-469-8827

GroupID: Comm

886051-001

M-SE-W

Elevated detection limit due to matrix effects.

PROCESS WATER

W-N-W

Elevated detection limit due to matrix effects.



1795 Industrial Drive Green Bay, WI 54302 920-469-2436 800-7-ENCHEM Fax: 920-469-8827

- Analytical Report -

Project Name:

Project Number:

Client: GREEN BAY PACKAGING INC

Report Date: 11/6/98

WI DNR LAB ID: 405132750

Sample No. 886439-001

Field ID

i ID

Collection Date 10/28/98

Sample No.

Field ID

Collection

Date

6439-001 PROCESS WATER REUSE 10/28

uncertainty of the parameter concentration between the LOD and the LOQ.

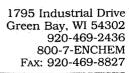
Soil VOC detects are corrected for the total solids, unless otherwise noted.

I certify that the data contained in this Final Report has been generated and reviewed in accordance with approved methods and Laboratory Standard Operating Procedure. Exceptions, if any, are discussed in the accompanying sample narrative. Release of this final report is authorized by Laboratory management, as is verified by the following signature.

The "Q" flag is present when a parameter has been detected below the LOQ. This indicates the results are qualified due to the

Approval Signature

Date





- Analytical Report -

Project Name: PROCESS WATER ANALYSIS

Project Number:

Client: GREEN BAY PACKAGING INC

Field ID: PROCESS WATER

Report Date: 11/5/98

Collection Date: 10/12/98

Lab Sample Number: 886051-001

WI DNR LAB ID: 405132750

Matrix Type: WATER

Inorganic Results

Test	Result	LOD	LOQ	EQL	Units	Code	Analysis Date	Prep Method	Analysis Method	Analyst
Arsenic	< 5.9	5.9	19		ug/L		10/29/98	SW846 3015	SW846 6010B	*MD
Barium	500	0.26	0.83	•	ug/L		10/29/98	SW846 3015	SW846 6010B	*MD
Beryllium	< 0.48	0.48	1.5		ug/L		10/29/98	SW846 3015	SW846 6010B	*MD
Cadmium	3.4	0.41	1.3		ug/L		10/29/98	SW846 3015	SW846 6010B	*MD
Chloride	250	1.4	4.5		mg/L		10/26/98	EPA 325.1	EPA 325.1	*MD
Copper	64	1.6	5.1		ug/L		10/29/98	SW846 3015	SW846 6010B	*MD
Fluoride	0.65	0.075	0.24		mg/L		10/27/98	SM 4500F-C	SM 4500F-C	*MD
Iron	570	34	110		ug/L		10/29/98	SW846 3015	SW846 6010B	*MD
Lead	16	3.0	9.6		ug/L		10/29/98	SW846 3015	SW846 6010B	*MD
Manganese	1200	0.41	1.3		ug/L		10/29/98	SW846 3015	SW846 6010B	*MD
Mercury	attached				ug/L			SW846 7470A	SW846 7470A	*NLS
Nickel	120	2.4	7.6		ug/L		10/29/98	SW846 3010A	SW846 6010B	*MD
Nitrogen, NO3 + NO2	< 0.26	0.26	0.83		mg/L	М	10/29/98	EPA 353.2	EPA 353.2	*MD
Phenolics, total recoverable	1.8	0.21	0.67		mg/L		10/28/98	EPA 420.2	EPA 420.2	*MD
Selenium	4.4	0.67	2.1		ug/L	M	11/2/98	SW846 3015	SW846 7740	*MD
Silver	< 0.43	0.43	1.4		ug/L		10/29/98	SW846 3015	SW846 6010B	*MD
Sulfate	960	20	64		mg/L		10/27/98	EPA 375.2	EPA 375.2	*MD
Zinc	580	3.7	12		ug/L		10/29/98	SW846 3015	SW846 6010B	*MD





- Analytical Report -

Project Name:

Project Number:

Field ID: PROCESS WATER REUSE

Lab Sample Number: 886439-001

WI DNR LAB ID: 405132750

Client: GREEN BAY PACKAGING INC

Report Date: 11/5/98

Collection Date: 10/28/98

Matrix Type: WATER

Inorganic Results

Test	Result	LOD	LOQ	EQL	Units	Code	Analysis Date	Prep Method	Analysis Method	Analyst
Special Analytical Services	Attached									*LAN



1 of 2 Page:

LLI Sample No. WW 3028604 Collected: 10/28/98

Submitted: 10/29/98 Reported: 11/ 4/98

Discard: 11/19/98

001 Process Water Sample Project 886439

Account No: 10149

En Chem

1241 Bellevue Street WI 54302 Green Bay

P.O. 886439 Rel.

AS RECEIVED

CAT NO.

ANALYSIS NAME

LIMIT OF

QUANTITATION **RESULTS**

ug/1

UNITS

4144 Formaldehyde in Water < 5,000.

5.000.

Due to the nature of the sample matrix, a reduced aliquot was used for analysis. The Limits of Quantitation (LOQ's) were raised accordingly.

1 COPY TO En Chem ATTN: Ms. Lori Woelfel

Questions? Contact your Client Services Representative Gwen A. Birchall at (717) 656-2300 09:20:04 D 0001 1 417 0.00 00035000 ASR000 638421

> Respectfully Submitted Jenifer E. Hess, B.S. Group Leader Pesticides/PCBs



Lancaster Lappratories 2425 New Horand Fixe PO Box 13425 tiancaster, PA 17615-2415



Analysis Repor

LABORATORY CHRONICLE



2 of Page:

LLI Sample No. WW 3028604 Collected: 10/28/98

Submitted: 10/29/98

001 Process Water Sample Project 886439

001 -- SDG#:

CAT NO

ANALYSIS NAME

1013 Formaldehyde Extraction

4144 Formaldehyde in Water

METHOD

SW-846 8315A SW-846 8315A

Account No: 10149

En Chem

1241 Bellevue Street Green Bay WI 54302

ANALYSIS

1

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TRIAL ID DATE AND TIME **ANALYST**

10/30/98 1100 Anita M. Dale 11/02/98 1058 Michelle J. Kolodziejski

Canitaster (apporatories 24230 Eurofoliand Pike 65330 (2425 orango 44 1 505-2425

NORTHERN LAKE SERVICE, INC.

Analytical Laboratory and Environmental Services 400 North Lake Avenue - Crandon, WI 54520 Tel:(715)478-2777 Fax:(715)478-3060

ANALYTICAL REPORT

WIS. LAB CERT. NO. 721026460

PAGE: 1

NLS PROJECT# 44238

NLS CUST#

87182

Client:

En Chem Inc Attn: Tom Trainor 1241 Bellevue Street

Green Bay, WI 54302

Project Description: Low Level Hg

Sample ID: 001

NLS#: 182191

COC Description: 001

Collected: 10/12/98 Received: 10/14/98

Reported: 11/03/98

Parameter Result Units LOD LOQ Method Analyzed Lab Mercury, Low Level as Hg 110 ng/L 19 76 EPA 245.7M 11/03/98 721026460

Values in brackets represent results greater than the LOD but less than the LOQ and are within a region of "Less-Certain Quantitation". Results greater than the LOQ are considered to be in the region of "Certain Quantitation".

LOD = Limit of Detection DWB = Dry Weight Basis

LOQ = Limit of Quantitation

NA = Not Applicable

ND = Not Detected

DWB = (mg/kg DWB)/10000

Reviewed by:

Authorized by: R. T. Krueger Laboratory Manager

Company Nar	ne: / Cris	Bay F	ackagr	rg		E		A	HE	EM INC.	92	Gree: 0-469-2	n Bay, W	300-736-2		608-2	Madiso: 232-3300	Science Drive n, WI 53711 • 1-888-536-2436 08-233-0502	Superio 715-392-584	8th Street, Suite 122 or, WI 54880 4 • 1-800-837-8238 15-392-5843
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Green Bay Packaging



MILL DIVISION

October 20, 1998

Mr. Jeffrey J. Haack, Wastewater Engineer Wisconsin Department of Natural Resources P. O. Box 10448 Green Bay, Wisconsin 54307-0448

Dear Jeff:

Re: WPDES Permit No. WI-0000973-6, FID No. 405032100

The Yard Process Water Collection Project that we discussed with you on October 1, 1998 was approved. The material was ordered and construction will begin just prior to the arrival of the material in approximately two weeks. Process water was sent in for analysis and the results are expected back in three weeks. Please call if you would like any further information.

Sincerely,

GREEN BAY PACKAGING INC.
Mill Division

allean Q Welson

Kathleen A. Nelson Environmental Manager

KAN:kn

Enclosure
cc: Brian Duffy
Orv Rautmann
Jeffrey Walch
File

Company Nam	e: Green Bay Pag	ko gi na	In-			() ()	À				1 1241	Dallamya	St., Suite 9		T EOE	Science Drive	1402 N 84	h Street, Suite 12	
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Telephone:	Kathy Nelso 930 433-50	11		_	CH	IAI.	N ()F	CU	JST	OL	Y		Z (692	Pag		of	
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CORRESPONDENCE/MEMORANDUM -

DATE:

October 7, 1998

FILE REF:

TO:

Files

FROM:

Jeff Haack - Green Bay

SUBJECT: Green Bay Packaging, Inc. (GBPI)

On Thursday, October 1, 1998, Chris Groth, Brown County Conservation Warden, and I went to the GBPI mill at 1601 N. Quincy Street in Green Bay to investigate and follow up on the recent spills which have occurred at this facility. Jeffrey Walch, Vice President/General Manager, Kathleen Nelson, Environmental Manager, and Brian Duffy, Corporate Environmental Director, participated in this discussion.

I began by characterizing this visit as a fact-finding mission. I advised that the department was very concerned about the fact that there have been three significant spills of process water over the past three months, and that we were considering enforcement actions to address this. I described the following alternatives under consideration: 1) A citation could be issued pursuant to s. 29.29 Stat., for discharging a deleterious substance to waters of the state. Since the volume spilled exceeded the volume recovered, there was apparently a discharge to groundwater, which is considered waters of the state. 2) GBPI could be referred to the Department of Justice for discharging without a permit, pursuant to s. 283.31 Stat. The WPDES permit issued to GBPI authorizes discharge to the Fox River, with appropriate effluent limitations, based upon characterization of the effluent provided in the permit application. 3) Or finally, the department could take no formal enforcement action after being satisfied that GBPI has taken all appropriate actions to prevent further spills of this nature. With either option 1 or 2, the department would also seek court orders to require actions to prevent further spills, in addition to (potential) monetary penalties.

Jeff Walch then described proposed revisions to the "Yard Process Water Collection Piping Layout." This was the second alternative mentioned in the September 24, 1998, letter from Kathy Nelson. Theses revisions consist of installing a new 24" diameter pipe to collect the drains and overflows from all five storage tanks located outside of the primary mill structure. This new pipe would then drain back into the basement of the mill. Two new catch basins would be installed, and the floor drain in building # 14 (where the pipe fitting failed resulting in the July 17, 1998, spill) would also be connected to this pipe. A drawing showing all of the revisions was provided. Brian Duffy inquired whether these revisions were subject to DNR review and approval requirements, and I responded that they were not. The design work has been completed, but funding has not yet been secured.

Kathy Nelson also described changes in the alarm system, and spill response procedures. With regard to the alarm system, tank overflows or similar alarms, have been switched to a



different system such that it is much more difficult to disregard, as happened with the September 3, 1998, spill. I requested more complete description in writing. With regard to the spill response procedures, several changes have been made. First, these procedures now include spills of the "process water." Previously only specific chemicals used on-site were included. Secondly, the procedures now specify that spilled process water must be cleaned up as soon as possible. And third, the responsibility for spill response has been clearly specified as the responsibility of the shift supervisor.

Chris and I also requested more complete characterization of the process water which had been spilled on these three occasions. This information is requested to evaluate whether some remediation of the "contaminated" soil and groundwater is appropriate. I suggested using NR 140, Wisc. Admin. Code as a guide, reviewing the MSDS sheets for any additives to ascertain substances which may be present, and performing an actual analysis. I advised that I did not foresee a need for analysis of a wide range of organic substances, but expected analysis for a number of inorganic substances for which groundwater standards have been established.

We then proceeded out the area west of the mill, where these three spills had occurred. Jeff Walch did not accompany us during this part of the visit. Chris expressed concern about tank failure, considering the size of several of these tanks and their close proximity to the Fox River. This may simply be a matter of careful attention to the grading of the surface in the area.

We concluded this visit by summarizing the information which was requested: 1) Status report on the yard piping project; 2) Characterization of the process water; 3) Description of changes to the alarm system and spill response procedures; and 4) Addressing the potential for tank failure. I expect that the characterization will require approximately a month to complete, and a single response is requested. Whether any further action by the department is appropriate will be determined following a review of this information.

cc: Chris Groth

Roxanne Chronert Nelezen

Judy Doelger

Jeff Brauer - WT/2

NER Wastewater Files

Green Bay Packaging



MILL DIVISION

October 7, 1998

Mr. Jeffrey J. Haack, Wastewater Engineer Wisconsin Department of Natural Resources P. O. Box 10448 Green Bay, Wisconsin 54307-0448

Dear Jeff:

Re: WPDES Permit No. WI-0000973-6, FID No. 405032100

We have installed the alarms on the sump pumps in the 250,000 Pump House and the Krofta Pump House to the environmental alarm system. These alarms have a red flashing light hooked up to them so they do not become one of many alarms during down time. I have included the print out from an alarm check on the new alarms.

The alarm write up has been updated to include these alarms. It will probably be updated again after I receive feed back from the employees. A copy of this write up is attached to the alarm print out where the person acknowledges the alarm. The Shift Coordinator, whom is on site 24 hrs. / Day, has been assigned the responsibility to respond to every alarm. I have discussed the alarm procedures and write-up with the Shift Coordinators, Machine Tenders, Back Tenders, and the lab personnel again.

Sincerely,

GREEN BAY PACKAGING INC.
Mill Division

Shleen a Welin

Kathleen A. Nelson Environmental Manager

KAN:kn

cc: Brian Duffy
Orv Rautmann
Jeffrey Walch
File

FRI OCTOBER 2, 1998 7:47:3 250 PUMP HOUSE FLOODED

250 PUMP HOUSE NORMAL

FRI OCTOBER 2, 1998 7:47:8 DURATION 0:0:5

FRI OCTOBER 2, 1998 7:47:25 250 PUMP HOUSE FLOODED

250 PUMP HOUSE NORMAL

FRI OCTOBER 2, 1998 7:47:27 DURATION 0:0:2

250 PUMP HOUSE NORMAL

FRI OCTOBER 2, 1998 7:47:30 DURATION 0:0:2

FRI OCTOBER 2, 1998 7:51:12 KROFTA PUMP KOUSE FLOODED

FRI OCTOBER 2, 1998 KROFTA PUMP HOUSE NORMAL

7:51:19 DURATION 0:0:7

FRI OCTOBER 2, 1998 KROFTA PUMP HOUSE NORMAL

7:51:21 DURATION 0:0:1